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To: California.petition@ee.doe.gov

cc: lgordon@sdwca.org

Subject: Docket #EE-RM-PET-100, California Preemption Exemption Petition

☐ Federal Record

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March 30, 2006

Samuel W. Bodman  
Secretary of Energy  
United States Department of Energy  
1000 Independence Avenue, SW  
Washington, DC 20585

Re: EE-RM-PET-100  
Water Efficiency Standards for Residential Clothes Washers

Dear Mr. Secretary:

Padre Dam Municipal Water District provides water, wastewater, recycled water and recreation services to over 130,000 customers in San Diego County.

**We strongly urge you to approve the petition to exempt from preemption California's water efficiency standards for residential clothes washers.**

As you know, the system of aqueducts, reservoirs, power plants and pump stations needed to deliver water from sources in Northern California to population centers in Southern California is the single largest user of electricity in the state. In California, water and electricity are both in high demand and short supply, and conservation is vital to meeting long-term demand.

In 2002, at the request of the Legislature, the California Energy Commission adopted water efficiency standards for residential clothes washers. An 8.5 water factor standard implemented statewide, for example, will conserve enough energy to supply 50,000 homes. A 6.0 water factor standard will save enough energy for 85,000 homes.

As we have seen with the toilet industry, water efficiency standards for the clothes washer industry will generate competition, innovation, consumer demand and consumer value. Appliance manufacturers know this and respond to the opportunity: 30% of clothes washers sold in California already comply with the 8.5 water factor standard and 20% comply with the 6.0 water factor standard. Water agencies further incentivize sales and reward manufacturers by providing customer rebates.

Padre Dam supports a residential clothes washer water efficiency standard of 8.5, effective January 1, 2007, followed by a 6.0 standard effective January 1, 2010, to conserve and manage supplies for a growing population. We sincerely hope you will approve the Petition to Exempt From Preemption California's Water Efficiency Standards for Residential Clothes Washers.

Sincerely,  
PADRE DAM MUNICIPAL WATER DISTRICT

August A. Caires  
General Manager